Thomas P. Riley, SBN 194706 LAW OFFICES OF THOMAS P. RILEY, P.C. First Library Square 1114 Fremont Avenue South Pasadena, CA 91030-3227 3 Tel: 626-799-9797 Fax: 626-799-9795 TPRLAW@att.net 5 **Attorneys for Plaintiff** 6 Joe Hand Promotions, Inc. 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 Joe Hand Promotions, Inc., CASE NO. 3:13-cv-03023-JSW 10 11 STIPULATION OF DISMISSAL OF Plaintiff, PLAINTIFF'S COMPLAINT AGAINST 12 **DEFENDANTS MUJEEB HAMID and** VS. KIRIAN FITZGIBBONS, individually and 13 d/b/a CSA-COMBAT SPORTS ACADEMY Mujeeb Hamid, et al., 14 AS MODIFIED HEREIN Defendants. 15 16 17 IT IS HEREBY STIPULATED by and between Plaintiff JOE HAND PROMOTIONS, INC. 18 and Defendants MUJEEB HAMID and KIRIAN FITZGIBBONS, individually and d/b/a CSA-19 COMBAT SPORTS ACADEMY, that the above-entitled action is hereby dismissed without 20 prejudice against MUJEEB HAMID and KIRIAN FITZGIBBONS, individually and d/b/a CSA-COMBAT SPORTS ACADEMY, and subject to the Court's jurisdiction to enforce the settlement 21 22 agreement reached between the Parties. IT IS FURTHER STIPULATED that provided no Party referenced above has filed a 23 motion to reopen this action by January 31, 2014, the dismissal shall be deemed to be with 24 prejudice. /// 26 /// 27 28

STIPULATION OF DISMISSAL Case No. 3:13-cv-03023-JSW

PAGE 1

This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party 1 referenced-above shall bear its own attorneys' fees and costs. 2 3 4 5 AW OFFICES OF THOMAS P. RILEY, P.C. By: Thomas P. Riley, Esquire 6 Attorneys for Plaintiff 7 JOE HAND PROMOTIONS, INC. 8 9 10 Dated: January 14, 2014 s/Matthew A. Pare 11 LAW OFFICE OF MATTHEW A. PARE, A.P.C By: Matthew A. Pare, Esquire 12 Attorneys for Defendants MUJEEB HAMID and KIRIAN FITZGIBBONS, individually 13 and d/b/a CSA-COMBAT SPORTS ACADEMY 14 15 16 17 18 19 20 21 22 23 If any party seeks to re-open this case, they shall do so by way of a properly IT IS SO ORDERED: noticed motion, which is supported by a factual and legal showing that the Court 24 would continue to have jurisdiction over the matter. 25 Dated: January 17, 2014 26 27 es District Court Northern District of California 28

STIPULATION OF DISMISSAL Case No. 3:13-cv-03023-JSW PAGE 2